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Federal Defenders OF NEW YORK, INC.

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September 28, 2021

## **VIA ECF**

Honorable P. Kevin Castel United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Adinel Rodriguez Polanco</u>

20 Cr. 237 (PKC)

Dear Judge Castel,

I write to respectfully request that the Court adjourn the conference currently scheduled for October 6, 2021 for approximately 30 days. Undersigned counsel recently received a plea agreement from the government, which we are translating and reviewing. We expect that the newly-scheduled date can be a change-of-plea conference. The government, by Assistant United States Attorney Thomas John Wright, has no objection to this application.

Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the newly selected date.

Thank you for your consideration.

Respectfully submitted,

/s/ Sylvie Levine Attorney for Mr. Rodriguez Polanco 212-417-8729

The conference originally scheduled for October 6, 2021 is adjourned to November 9, 2021 at 12:00 p.m. in Courtroom 11D. I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. My reasons for this finding are that the grant of the continuance is needed to permit the parties to continue discussions regarding a pretrial resolution of this case. Accordingly, the time between today and November 9, 2021 is excluded under the Speedy Trial Act.

SO ORDERED. Dated: 9/28/2021

> P. Kevin Castel United States District Judge